Remarks

Claims 166-185 currently stand rejected and remain pending in the application. Claims 1-165 were previously canceled. No claims are amended herein. The Applicant respectfully traverses the rejections and requests allowance of claims 166-185.

Rejection Under 35 U.S.C. § 112

Claims 166-185 stand rejected under 35 U.S.C. § 112, first paragraph, for failing to comply with the written description requirement. (Page 2 of the Office action.) More specifically, the Office action indicates that "[t]he limitation 'voice call' is not described in the specification to support the claimed limitations. The Examiner requests Applicant to show where in the specification does the voice call include a cookie and processing the cookie included in the voice call to select one of the call center resources, also wherein processing the cookie included in the voice call is based on Internet Protocol address." (Id.)

The Applicant respectfully traverses the rejection. The present application states that "[b]esides chat rooms, text e-mails, and web browsing, the Internet is rapidly expanding towards new types of communication such as *video conferencing* and *voice calls*." (Page 3, lines 9-11; emphasis supplied.) To address these two new types of Internet communication, the present application immediately thereafter indicates that "[a] web call is an Internet session for exchanging information using *call treatment* or *video conference treatment*." (Page 3, lines 12 and 13; emphasis supplied.) Thus, the term "web call" applies to both video conferencing ("video conference treatment") and *voice calls* ("call treatment"); in other words, one type of web call is a voice call.

For further support, the present application further indicates that in one example of call treatment, "[a] gateway coverts the web call into a *traditional* voice call." (Page 3, lines 15 and 16; emphasis supplied.) For such a conversion to be possible, the web call itself is a voice call, albeit a *nontraditional* one.

In addition, the web call definition discussed above is repeated in relation to the system of Fig. 1, at page 5, lines 10 and 11. Further concerning Fig. 1, the present application indicates that the web call discussed in one embodiment is a voice call, since "the caller may need to *talk to the billing department after talking with a sales agent at*

the web call center." (Page 6, lines 27 and 28; emphasis supplied.) Thus, the Applicant respectfully contends that the present application indicates at multiple locations that one type of web call is a voice call, and thus describes the limitation "voice call" as it is employed in claims 166-185.

Independent claims 166 and 176 provide for receiving a voice call originating from a user device including a cookie, and processing the cookie from the user device to select one of the call center resources. In relation to Figs. 1 and 2, the present application discusses this possibility by disclosing a web call server 110 receiving a call request message originating from a communication device 102, *wherein the call request message may be the web call itself*. (Page 5, line 29, to page 6, line 3.) Further, the present application indicates that the web call server 110 identifies an available web call center resource 120 based upon information stored in a cookie *in response to receiving the call request message*. (Page 6, lines 5-10.) Also, cookies are known to those of skill in the art to be stored on a user's computer (see page 3, lines 2 and 3 of the present application) or similar user device for transmission from the device over the Internet to a web server as part of a subsequent request for access. As a result, the present application indicates that the call request message includes the cookie in one embodiment. Moreover, in the case the call request message is the web (voice) call itself, as indicated in the present application, the call includes the cookie, and the cookie is processed to identify the available web call center resource. Thus, the Applicant contends that the present application discloses receiving the voice call originating from the user device including the cookie, and processing the cookie from the user device to select one of the call center resources, as provided for in independent claims 166 and 176, and such indication is respectfully requested.

Further, dependent claims 169 and 179 indicate that processing the cookie from the user device to select one of the call center resources is further based upon an Internet Protocol address. In support, the present application teaches that "[i]n various embodiments of the invention, *the web call server 110 identifies the available web call center resource 120 based upon an Internet Protocol address*…." (Page 6, lines 11-13; emphasis supplied.) Further, since the present application indicates that this selection or identification of a call center resource is performed in response to receiving the call

(including the cookie), as discussed above, the Applicant respectfully asserts that the subject matter of processing the cookie from the user device to select one of the call center resources is further based upon an Internet Protocol interface, as provided for in claims 169 and 179, is disclosed in the present application, and such indication is respectfully requested.

Thus, in view of the foregoing, the Applicant contends that claims 166-185 comply with the written description requirement, and respectfully requests withdrawal of the 35 U.S.C. § 112, first paragraph, rejection.

Rejection Under 35 U.S.C. § 102

Claims 166-185 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,493,447 to Goss et al. (hereinafter "Goss"). (Page 3 of the Office action.) The Applicant respectfully traverses the rejection in light of the following comments, which are substantially taken from the pre-appeal brief request for review of September 18, 2006, associated with the present application.

Receiving a Voice Call Originating from a User Device Including a Cookie

The Office action indicates Goss teaches receiving the voice call originating from a user device including the cookie at column 6, lines 5-11 and 26-30. (Page 3 of the Office action.) The Applicant respectfully disagrees, as discussed below.

Generally, Goss discloses "a Contact Server [28] that enables customers to submit call-back requests to a call center via the Internet, or virtually any other communications technology available." (Fig. 1; column 1, lines 62-65.) The preferred embodiment discussed at length in Goss involves a call-back request initiated by the user while the user is accessing "a Web site that is supported by the Web Server 30 on the call center's Intranet Server 66." (Fig. 1; and column 5, lines 63-67.) Goss further indicates that "[t]he Web Server 30 maintains a session with the customer's browser 44 using cookies or other session maintenance methodology." (Column 6, lines 9-11.) Goss later states that "[t]he Intranet Server 66 receives the call-back request. Since it has been maintaining a session with the customer's browser 44, it knows who the customer is from the customer log on." (Column 6, lines 27-30.) The Contact Server 28 is coupled with

the Intranet Server 66 and actually provides the call-back services. (Column 4, lines 13-22.) However, such an access by the user in this case is not a voice call, as provided for in claims 166 and 176, but is instead a web page access via a browser.

Goss also indicates that "[t]he Contact Server can be used in several different embodiments of call centers, using different communications technologies such as PSTN telephony, Internet data communications, or Internet telephony." (Column 22, lines 49-52.) However, Goss does not appear to indicate that any voice call from a user includes a cookie that is received by the Contact Server and processed to determine how to direct the call. For example, Goss discusses requests placed over the PSTN 20. (Column 23, lines 6-14.) However, under that scenario a "VRU [Voice Response Unit] 16 collects caller information regarding the type of services required." (Column 23, lines 9 and 10.) Thus, Goss does not teach or suggest receiving the voice call originating from a user device including the cookie, as provided for in claims 166 and 176, and such indication is respectfully requested.

Routing the Voice Call Originating from the User Device to the Selected One of the Call Center Resources

The Office action also alleges that the operation of routing the voice call originating from the user device to the selected one of the call center resources is disclosed in Goss at column 6, lines 56-65, and at column 7, lines 1-10. (Page 3 of the Office action.) The Applicant respectfully disagrees with the allegation.

As discussed earlier, Goss indicates that the *Contact Server* 28 is responsible for receiving call-back requests. If an agent of the call center (i.e., a call center resource) is available, "*the agent can then place a telephone call* to the number provided by the customer who submitted the call-back request…." (Column 2, lines 4-6; emphasis supplied.) "If an agent is not available, the Contact Server can be used to *provide call-back services at a later time* via telephony, the Web, or virtually any other communications technology." (Column 2, lines 14-16; emphasis supplied.) Thus, whether or not an agent is available at the time of the call-back request, *the agent ultimately responding to the request originates a call to the customer* requesting the call-back. Therefore, Goss does not teach or suggest "*routing the voice call originating from*

the user device to the selected one of the call center resources," as provided for in claims 166 and 176, and such indication is respectfully requested.

Claims 167-175 depend from independent claim 166, and claims 177-185 depend from independent claim 176, thus incorporating the provisions of their respective independent claims. Thus, the Applicant asserts claims 167-175 and 177-185 are allowable for at least the reasons provided above in support of claims 166 and 176, and such indication is respectfully requested.

Thus, based on the foregoing, the Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of claims 166-185.

Conclusion

Based on the above remarks, the Applicant submits that claims 166-185 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Applicant thus respectfully requests allowance of claims 166-185.

The Applicant believes no fees are due with respect to this filing. However, should the Office determine fees are necessary, the Office is hereby authorized to charge Deposit Account No. 21-0765.

Respectfully submitted,

Date: 01/15/2008

/Kyle J. Way/

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